

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**BEATRICE WILLIS,**

**Plaintiff,**

**V.**

**SEARS, ROEBUCK & CO.,**

**Defendant.**

**CIVIL ACTION NO. 03-CV-05-1019-W**

**JOINT MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE**

The plaintiff, Beatrice Willis and the defendant Sears Roebuck & Co., move this Court to extend the dispositive motion deadline by seven (7) days, making the dispositive motion deadline October 16, 2006, rather than October 9, 2006. As grounds for this Motion, the parties state as follows:

1. The current deadline for filing any dispositive motions in the above-styled case is October 9, 2006.
2. The parties just recently received a copy of the transcript of plaintiff's deposition and the exhibits. Defendant's counsel is in the process of reviewing said documents, along with additional documents received during the discovery process and is in need of additional time to prepare Sears' brief and evidentiary materials in support of its motion for summary judgment.
3. The requested extension will not prejudice either party and will not affect any other deadline established in this case, including the discovery deadline or trial date.
5. The parties have jointly agreed to this motion, and plaintiff's counsel has given the undersigned the authority to represent to the Court that he joins with

defendant's counsel in filing this motion. The undersigned is signing on behalf of both parties in an effort to expedite the filing and consideration of this motion.

Wherefore, premises considered, the parties respectfully request that this Court grant this Motion and extend the deadline for filing dispositive motions by seven (7) days.

Respectfully submitted,

/s/Mac B. Greaves

Mac B. Greaves (GRE007)

Mieke A. Hemstreet (HEM007)

Attorneys for Defendant

SEARS, ROEBUCK AND CO.

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Defendant has been served on the following by directing same to his office address through first-class, United States mail, postage prepaid, on this the 5th day of October, 2006:

T. Robin McIntyre  
2101 Executive Park Drive  
Opelika, AL 36801

/s/ Mac B. Greaves

OF COUNSEL